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## Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

In re:	Chapter 11 Proceedings
PARAMOUNT BUILDING SOLUTIONS, LLC	Case No. 2:17-bk-10867-EPB
CLEANING SOLUTIONS, LLC	Case No. 2:17-bk-10868-DPC
JMS BUILDING SOLUTIONS, LLC	Case No. 2:17-bk-10869-BKM
STARLIGHT BUILDING SOLUTIONS, LLC,	Case No. 2:17-bk-10870-EPB (Jointly Administered)
	Debtors.

PARAMOUNT BUILDING SOLUTIONS, LLC;  
CLEANING SOLUTIONS, LLC;  
JMS BUILDING SOLUTIONS, LLC; and  
STARLIGHT BUILDING SOLUTIONS, LLC.

#### **Plaintiffs.**

V.  
US METRO GROUP, INC.,

**Defendant.**

Plaintiffs, PARAMOUNT BUILDING SOLUTIONS, LLC; CLEANING SOLUTIONS, LLC; JMS BUILDING SOLUTIONS, LLC; and STARLIGHT BUILDING SOLUTIONS, LLC (“**Plaintiffs**”), by and through their counsel undersigned, hereby request this Court enter an Order directing Defendant to show cause, if it has any, why it should not be held in contempt of this

Court's Interim Order entered on September 21, 2017 at DE #30. On November 27, 2017, the Plaintiffs filed a Complaint against Defendant. A copy of the Complaint is attached hereto and incorporated herein by this reference as **Exhibit A**. The Complaint alleges, *inter alia*, Defendant is currently in violation of what has been identified as the "Interim DIP Order." Specifically, paragraph 15 of the Interim DIP Order prevents Defendant from, *inter alia*, attempting to effect a setoff of any monies it owes Plaintiffs.

Contrary to the terms of the Interim DIP Order, Defendant has in fact attempted to set-off the sum of \$235,467.66 against monies it otherwise owes to Plaintiffs.

Demand has been repeatedly made on Defendant to turn over these monies, and Defendant continues to refuse to do so.

Accordingly, Plaintiffs request this Court enter an order requiring the Defendant to show cause, if it has any, why it should not be held in contempt of the Interim DIP Order.

DATED this 27<sup>th</sup> day of November, 2017.

MICHAEL W. CARMEL, LTD.

/s/Carmel, M.W. (007356)  
Michael W. Carmel  
80 East Columbus Avenue  
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Attorney for Plaintiffs

COPY of the foregoing mailed  
this 27<sup>th</sup> day of November, 2017 to:

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*Attorney for Defendant*

By Sharon D. Kirby